

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

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|----------------------------------|-------------------------------------|
| CRAIGVILLE TELEPHONE CO. d/b/a) | |
| ADAMSWELLS; and CONSOLIDATED) | |
| TELEPHONE COMPANY d/b/a CTC) | |
|) | |
| Plaintiffs,) | No. 1:19-cv-07190 |
|) | |
| v.) | Judge Sharon Johnson Coleman |
|) | Magistrate Judge Jeffrey T. Gilbert |
| T-MOBILE USA, INC.; and) | |
| INTELIQUENT, INC.) | |
|) | |
| Defendants.) | |

**PLAINTIFFS' NOTICE OF POTENTIAL REFERENCE TO CONFIDENTIAL
INFORMATION AT NOVEMBER 7, 2022 STATUS HEARING**

Plaintiffs Craigville Telephone Co. d/b/a AdamsWells and Consolidated Telephone Company d/b/a CTC, on behalf of themselves and a class of similarly-situated companies (collectively, "Plaintiffs"), and pursuant to Paragraph 12 of the Agreed Confidentiality Order (ECF 164) ("Confidentiality Order"), hereby provide the Court notice that they may refer to information currently marked by Defendants, T-Mobile USA, Inc.'s ("TMUS") and Inteliquent, Inc. ("Inteliquent"), or third parties, as Confidential Information under the Confidentiality Order at the November 7, 2022 status conference if issues calling for discussion of such materials arises.

The Confidentiality Order requires the parties to provide the Court advance notice of their intent to use or refer to Confidential Information at a hearing:

Nothing in this Order shall be construed to affect the admissibility or use of any document, material, or information at any trial or hearing in open court, provided that the following procedures are followed with respect to Confidential Information: *A party that intends to present or that anticipates that another party may present Confidential Information at a hearing or trial shall bring that issue to the Court's and parties' attention* in their request for hearing, *in a notice to the court*, by motion or in a pretrial memorandum without disclosing the Confidential Information. The Court may thereafter make such orders as are necessary to govern the use of such documents or information at the hearing or trial. Any

requests for confidentiality or sealing of any hearing or trial is to be made to the judge presiding over that proceeding.

Confidentiality Order, ¶ 12 (emphasis added). Although Plaintiffs do not have a present intent to use or refer to any particular Confidential Information, Plaintiffs anticipate that there may be occasions during the Status Hearing, in response to questions from the Court or in rebuttal to assertions that may be made by Defendants, when it could become necessary for Plaintiffs to refer to information marked confidential by the Defendants or third parties in order to effectively represent the interests of the Plaintiffs. For these reasons, Plaintiffs hereby provide notice of their potential references to Confidential Information at the November 7, 2022 Status Hearing so that the Court may make any necessary preparations should discussions concerning Confidential Information arise.

Counsel for TMUS and Inteliquent have advised Plaintiffs that Defendants do not anticipate there being any reason to invoke any provisions of the protective order during the status conference.

/s/ David T.B. Audley

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CERTIFICATE OF SERVICE

I hereby certify that on this the 4th day of November, 2022, I served the foregoing Plaintiffs' Notice of Potential Reference to Confidential Information at November 7, 2022 Status Hearing via the ECF system on parties that have consented to the same in accordance with applicable Federal Rules of Civil Procedure and the Local Rules of the U.S. District Court for the Northern District of Illinois.

By: /s/ David T.B. Audley